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FILED WITH THE BOARD OF
PSYCHOLOGICAL EXAMINERS
ON November 19, 1997

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STATE OF NEW JERSEY
DEPT. OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF PSYCHOLOGICAL
EXAMINERS
STATE BOARD OF MEDICAL
EXAMINERS
BOARD OF MEDICAL EXAMINERS

IN THE MATTER OF THE SUSPENSION
OR REVOCATION OF THE LICENSES OF
MICHAEL S. ABRAMS, Ph.D. AND
LIDIA DENGELI, Ph.D.
TO PRACTICE PSYCHOLOGY, AND OF
SALVATORE NAPOLI, M.D.
TO PRACTICE MEDICINE AND SURGERY
IN THE STATE OF NEW JERSEY

:
: Administrative Action
:
:
: ANSWER ON BEHALF OF LIDIA
: DENGELI-ABRAMS, Ph.D.

LIDIA DENGELI ABRAMS, PH.D. ("Respondent") through her
attorneys, Brach, Eichler, Rosenberg, Silver, Bernstein, Hammer &
Gladstone, by way of answer to the Complaint says:

GENERAL ALLEGATIONS

1. Respondent admits the allegations contained in paragraph one.
2. Respondent admits the allegations contained in paragraph two.
3. Respondent admits the allegations contained in paragraph three.
4. Respondent neither admits nor denies the allegations contained in paragraph four since the allegations contained therein do not pertain to Respondent.
5. Respondent admits the allegations contained in the first sentence of paragraph five. Respondent denies the allegations contained in the second sentence of paragraph five except Respondent admits she was an owner of Psychological Health, Inc. before it became a non-profit entity.
6. Respondent neither admits nor denies the allegations contained in the first sentence of paragraph six since the allegations contained therein do not pertain to Respondent. Respondent admits the allegations contained in the second sentence of paragraph six.
7. Respondent admits the allegations contained in paragraph seven.
8. Respondent denies the allegations contained in paragraph eight.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

COUNT 1 (AS TO MICHAEL ABRAMS, PH.D.)

1. Respondent repeats and realleges her answers to the General Allegations as set forth at length herein.

2. Respondent neither admits nor denies the allegations contained in paragraphs two through nine, including all subparts to these paragraphs, of this Count, since the allegations contained therein do not pertain to Respondent.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

COUNT 2 (AS TO MICHAEL ABRAMS, PH.D.)

1. Respondent repeats and realleges her answers to the General Allegations and Count 1 as set forth at length herein.

2. Respondent neither admits nor denies the allegations contained in paragraph two since the allegations contained therein do not pertain to Respondent.

3. Respondent neither admits nor denies the allegations contained in paragraph three since the allegations contained therein do not pertain to Respondent.

4. Respondent neither admits nor denies the allegations contained in paragraph four since the allegations contained therein do not pertain to Respondent.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

COUNT 3 (AS TO LIDIA DENGEELEGI, PH.D.)

1. Respondent repeats and realleges her answers to the General Allegations, Count 1 and Count 2 as set forth at length herein.

2. Respondent admits the allegations contained in paragraph two for the period August 1992 to March 1993. Respondent denies all other allegations set forth in paragraph two.

3. Respondent denies the allegations contained in paragraph three.

4. Respondent denies the allegations contained in paragraph four.

5. Respondent denies the allegations contained in paragraph five.

6. Respondent denies the allegations contained in paragraph six.

7. Respondent denies the allegations contained in paragraph seven.

8. Respondent denies the allegations contained in paragraph eight.

9. Respondent denies the allegations contained in paragraph nine.

10. Respondent denies the allegations contained in paragraph ten.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

COUNT 4 (AS TO ABRAMS AND DENGELI-ABRAMS)

1. Respondent repeats and realleges her answers to the General Allegations, Count 1, Count 2 and Count 3 as set forth at length herein.

2. Respondent denies the allegations contained in paragraph two.

3. Respondent denies the allegations contained in paragraph three.

4. Respondent denies the allegations contained in paragraph four.

5. Respondent denies the allegations contained in paragraph five.

6. Respondent denies the allegations contained in paragraph six.

7. Respondent denies the allegations contained in paragraph seven.

8. Respondent denies the allegations contained in paragraph eight.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

COUNT 5 (AS TO SALVATORE NAPOLI, M.D.)

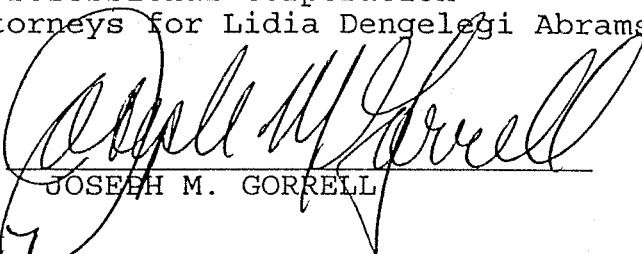
1. Respondent repeats and realleges her answers to the General Allegations, Count 1, Count 2, Count 3 and Count 4 as set forth at length herein.

2. Respondent neither admits nor denies the allegations contained in paragraphs two through eight, including all subparts to these paragraphs, of this Count since the allegations contained therein do not pertain to Respondent.

WHEREFORE, Respondent demands that the Attorney General's Complaint be dismissed with prejudice.

BRACH, EICHLER, ROSENBERG, SILVER,
BERNSTEIN, HAMMER, & GLADSTONE,
A Professional Corporation
Attorneys for Lidia Dengelegi Abrams, Ph. D.

BY:


JOSEPH M. GORRELL

DATED:

November 17, 1997

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CERTIFICATION OF FILING AND SERVICE

I HEREBY CERTIFY THAT on November 17, 1987 I forwarded a copy of the within pleading via U.S. Mail, to:

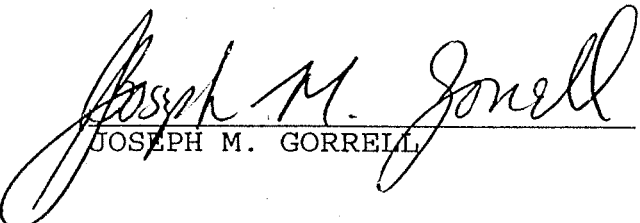
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I HEREBY CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


JOSEPH M. GORRELL

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